

**EXHIBIT 4**

**Certificate of Service**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

In re  
  
CITY OF DETROIT, MICHIGAN,  
  
Debtor.

Chapter 9  
  
Case No. 13-53846  
  
Hon. Steven W. Rhodes

**CERTIFICATE OF SERVICE**

I hereby certify that on December 16, 2013, I electronically filed the Debtor's Motion *in Limine* to Exclude the Testimony of Sharon McPhail with the Clerk of the Court which sends notice by operation of the Court's electronic filing service to all ECF participants registered to receive notice in this case.

Dated: December 16, 2013

/s/ Deborah Kovsky-Apap  
Deborah Kovsky-Apap (68258)